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1	Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999)	
2	WATT, TIEDER, HOFFAR & FITZGERALD, L. 2040 Main Street, Suite 300	L.P.
3	Irvine, CA 92614 Telephone: 949-852-6700	
4	Facsimile: 949-261-0771 Email: jkearl@watttieder.com	
5	cholley@watttieder.com	
6	Attorneys for Creditor Barnard Pipeline, Inc.	
7		D. MANDANDERS V. GOAVDE
8		BANKRUPTCY COURT FRICT OF CALIFORNIA
9	-	CISCO DIVISION
	_	8
10	In re:	Bankruptcy Case Case No. 19-30088 (DM)
11	PG&E CORPORATION,	Chapter 11
12	-and-	(Lead Case) (Jointly Administered)
13	PACIFIC GAS AND ELECTRIC COMPANY,	(002222)
14	,	
15	Debtors. ☐ Affects PG&E Corporation	NOTICE OF CONTINUES DEDERCTION
13	Affects FG&E Corporation	NOTICE OF CONTINUED PERFECTION OF MECHANICS LIEN PURSUANT TO 11
16	☐ Affects Pacific Gas and Electric Company	U.S.C. § 546(b)(2)
17	☐ Affects both Debtors	Sacramento County (Lien 201901250418)
18	* All papers shall be filed in the Lead Case, No. 19-30088 (DM)	
19		
20		
21	Barnard Pipeline, Inc. ("Barnard"), b	y and through its undersigned counsel, hereby gives
22	notice of continued perfection of its mechanic	cs lien under 11 U.S.C. § 546(b)(2), as follows:
23	Barnard has provided and deli	vered labor, services, equipment, and/or materials for
24	the construction and improvements of projection	ects located in the County of Sacramento, State of
25	California (the "Property"), the legal descrip	tion for which is set forth in the Claim of Mechanics
26	Lien, a true copy of which is attached hereto	as Exhibit A (the "Mechanics Lien").
27	2. The Property is owned by F	PG&E Corporation and/or Pacific Gas and Electric
28	Company (collectively, the "Debtors"), which	h filed voluntary petitions for relief under Chapter 11

Watt, Tieder, Hoffar &

NOTICE OF CONTINUED PERFECTION OF MECHANICS LIEN

FITZGERALD, L.L.P.
ATTORNEYS AT L.C. ase: 19-30088 Doc# 1412 Filed: 04/15/19 Entered: 04/15/19 12:16:10 Page 1 8 46(b)(2)

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of Title 11 of the United States Code (the "<u>Bankruptcy Code</u>") on January 29, 2019 (the "<u>Petition</u> <u>Date</u>").

- 3. On January 25, 2019, before the Petition Date, Barnard properly and timely recorded its Mechanics Lien under California Civil Code § 8400, et seq. in the Official Records of Sacramento County, State of California.
- 4. Through January 25, 2019, the amount owing to Barnard subject to its Mechanics Lien is at least \$81,694.16, exclusive of accruing interest and other charges, and additional amounts which have continued and are continuing, to accrue after the Petition Date.
 - 5. California Civil Code § 8460(a) provides that:

The claimant shall commence an action to enforce a lien within 90 days after recordation of the claim of lien. If the claimant does not commence an action to enforce the lien within that time, the claim of lien expires and is unenforceable[.]

- 6. Pursuant to California Civil Code § 8460, an action to enforce a lien must be commenced within 90 days after recordation of the claim of lien. However, section 362 of the Bankruptcy Code automatically stays Barnard from filing a state court action to enforce its mechanics lien. *See* 11 U.S.C. § 362.
 - 7. Section 546(b)(2) of the Bankruptcy Code provides that when applicable law

... requires seizure of such property or commencement of an action to accomplish such perfection, or maintenance or continuation of perfection of an interest in property; and ... such property has not been seized or such an action has not been commenced before the date of the filing of the petition; such interest in such property shall be perfected, or perfection of such interest shall be maintained or continued, by giving notice within the time fixed by such law for such seizure or such commencement.

See 11 U.S.C. § 362; see also Village Nurseries v. Gould (In re Baldwin Builders), 232 B.R. 406, 410-11 (9th Cir. 1999); Village Nurseries v. Greenbaum, 101 Cal.App.4th 26, 41 (Cal. Ct. App. 2002).

8. Accordingly, Barnard hereby provides notice of its rights as a lienholder in the Property pursuant to California's mechanics lien law. Barnard is filing and serving this notice to perfect, preserve, maintain, and continue the perfection of its lien and its rights in the Property to

comply with the requirements of California state law, 11 U.S.C. §§ 362(a), 362(b)(3), and 546(b)(2), and any other applicable law. This notice constitutes the legal equivalent of having recorded a mechanics lien in the recorder's office for the county where the Property is located and then having commenced an action to foreclose the lien in the proper court. By this notice, the Debtors and other parties in interest are estopped from claiming that the lawsuit to enforce Barnard's mechanics lien was not timely commenced pursuant to applicable state law. Barnard intends to enforce its lien rights to the fullest extent permitted by applicable law. The interests, perfected, maintained, or continued by 11 U.S.C. § 546(b)(2) extend in and to the proceeds, products, offspring, rents, or profits of the Property.

- The filing of this notice shall not be construed as an admission that such filing is 9. required under the Bankruptcy Code, the California mechanics lien law, or any other applicable law. In addition, Barnard does not make any admission of fact or law, and Barnard asserts that its lien is senior to and effective against entities that may have acquired rights or interests in the Property previously.
- The filing of this notice shall not be deemed to be a waiver of Barnard's right to 10. seek relief from the automatic stay to foreclose its mechanics lien and/or a waiver of any other rights or defenses.
 - Barnard reserves all rights, including the right to amend or supplement this notice. 11.

Dated: April // , 2019

WATT, TIEDER, HOFFAR & FITZGERALD, L.L.P.

By:

Jane G. Kearl (CA 156560) Colin C. Holley (CA 191999) 2040 Main Street, Suite 300

Irvine, CA 92614

Telephone: 949-852-6700 Facsimile: 949-261-0771

jkearl@watttieder.com Email:

cholley@watttieder.com

Attorneys for Creditor Barnard Pipeline, Inc.

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27

ATTORNEYS AT LAW

CERTIFICATE OF SERVICE

I hereby certify that on April 2019, I caused a copy of the foregoing Notice of Continued Perfection of Mechanics Lien Pursuant to 11 U.S.C. § 546(b)(2) to be sent via e-mail and/or first-class mail to the parties identified in the Master Core/2002 Service List attached hereto as Exhibit B.

Jane G. Kearl

WATT, TIEDER, HOFFAR &

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27	EXHIBIT A
28 WATT, TIEDER,	NOWAR OF COMMUNIC PRESENCE OF
WATT, TIEDER, HOFFAR & FITZGERALD, LEAN ATTORNEYS AT LAW IRVINE	PERFECTION OF STANDARD PROBLEM STANDARD PROBLEM OF CONTINUED PERFECTION OF Entered: MEGISTANDE TO STANDARD PROBLEM U.S.C. §

Recording requested by: Barnard Pipeline, Inc.

And when recorded mail this document to:

Jane G. Kearl, Esq. Robert C. Shaia, Esq. Watt, Tieder, Hoffar & Fitzgerald, LLP 2040 Main Street, Suite 300 Irvine, CA 92614



Sacramento County Donna Allred, Clerk/Recorder

Doc # 201901250418 Fees \$101.00 1/25/2019 11:43:48 AM Taxes \$0.00 JBS **PCOR** \$0.00 Titles 1 Paid \$101.00 Pages 3

For recorder's use

MECHANICS' LIEN (Cal. Civ. Code § 8416, et seq.)

1. BARNARD PIPELINE, INC. ("Claimant") claims a mechanics lien for the labor, services, equipment, and/or materials described in paragraph 2, furnished for a work of improvement on that certain real property located in the County of Sacramento, State of California, and more particularly described as:

All right, title and interest of Pacific Gas and Electric Company ("PG&E") at 4530 W Sherman Island Road, Rio Vista (APN 15800800050000), and all appurtenances and easements related thereto, including specifically, without limitation, all improvements, structures, and pipelines in or on which Claimant provided labor, services, equipment, and/or materials as set forth in paragraph 2.

- 2. After deducting all just credits and offsets, the sum of \$81,694.16 together with interest at the rate of 10% per annum from January 22, 2019, is due Claimant for the following: labor, services, equipment, and/or materials for replacement of high pressure natural gas pipeline fixtures, and related construction work performed under the Alliance Agreement Contract between Claimant and PG&E and Contract Work Authorization No. C9643, or as otherwise requested by PG&E.
- 3. Claimant furnished the labor, services, equipment, and/or materials, at the request of: PG&E.
- 4. The name and address of the owner(s) or reputed owner(s) of the real property is/are: PG&E, 77 Beale Street, 32nd Floor, San Francisco, CA 94105.

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5. Claimant's address is: 701 Gold Avenue, Bozeman, MT 59715.

Dated January 22, 2019

BARNARD PIPELINE, INC.

Zach Bowler Vice President

VERIFICATION

I, Zach Bowler, am the Vice President of Claimant on the foregoing Mechanics Lien and am authorized to make this verification for and on its behalf. I have read the foregoing Mechanics Lien and know the contents of the Mechanics Lien to be true of my own knowledge.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated January ZZ, 2019

Zach Bowler, Vice President

NOTICE OF MECHANICS LIEN

ATTENTION!

Upon the recording of the enclosed MECHANICS LIEN with the county recorder's office of the county where the property is located, your property is subject to the filing of a legal action seeking a court-ordered foreclosure sale of the real property on which the lien has been recorded. That legal action must be filed with the court no later than 90 days after the date the mechanics lien is recorded.

The party identified in the enclosed mechanics lien may have provided labor or materials for improvements to your property and may not have been paid for these items. You are receiving this notice because it is a required step in filing a mechanics lien foreclosure action against your property. The foreclosure action will seek a sale of your property in order to pay for unpaid labor, materials, or improvements provided to your property. This may affect your ability to borrow against, refinance, or sell the property until the mechanics lien is released.

BECAUSE THE LIEN AFFECTS YOUR PROPERTY, YOU MAY WISH TO SPEAK WITH YOUR CONTRACTOR IMMEDIATELY, OR CONTACT AN ATTORNEY, OR FOR MORE INFORMATION ON MECHANICS LIENS GO TO THE CONTRACTORS STATE LICENSE BOARD WEB SITE AT www.cslb.ca.gov.

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PROOF OF SERVICE

I, Julie Benton, declare:

I am employed in the County of Orange, State of California. I am over the age of 18 years and not a party to the within action. My business address is 2040 Main Street, Suite 300, Irvine, California 92614-6232.

On January 23, 2019, I served □ the originals ☒ true copies of the following document(s) described as MECHANICS LIEN and NOTICE OF MECHANICS' LIEN on the interested parties in this action, by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, the United States mail at Irvine, California addressed as set forth below:

Pacific Gas & Electric Company (PG&E) 77 Beale Street, 32nd Floor San Francisco, CA 94105

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 23, 2019, at Irvine, California.

Julie Benton

WATT, TIEDER,
HOFFAR &
FITZGERALD, L.L.P.
ATTORNEYS AT LAW

gemarr59@hotmail.com 619-342-9600 bzummer@TheAdlerFirm.com	RASvmm@aeraenergy.com	_	213-627-6342 evelina pentry@akerman.com	214-981-9339 john.mitchell@akerman.com	415-765-9501 averawford@akingump.com	310-229-1001 dsimonds@akingump.com	1	Idizengoff@akingump.com 212-872-1002 dbotter@akingump.com	Snggrrage and rewishormon.com ct@andrewsthormton.com 949-315-3540 aa@andrewsthornton.com	Andrew, Silten@arentfox.com Beth. Brownstein@arentfox.com	212-484-3990	213-629-7401 christopher.wong@arentfox.com	213-629-7401 Aram Ordubegian@arenffox.com	36-8689 steven.fruchter@arnoldporter.com	832-213-0157 185786@att.com	415-703-5480 Annadel Almendras@doi.ca.gov	510-622-2270 Margarita.Padilla@doj.ca.gov	213-897-2802 James Potter@doj.ca.gov	marthaeromerolaw@gmail.com	esagerman@bakerlaw.com 310-820-8859 lattard@bakerlaw.com	rjulian@bakerlaw.com	cdumas@bakerlaw.com Luckey.Mcdowell@BakerBotts.com	ian.Roberts@BakerBotts.com Kevin.Chiu@BakerBotts.com	Navi.Ohillon@BakerBotts.com	615-744-5544 irowland@bakerdonelson.com		424-204-4350 hubenb@ballardspahr.com	ganzc@ballardspanr.com mversms@ballardspahr.com	410-361-8930 summersm@ballardspahr.com	John.mccusker@bami.com	fiske@baronbudd.com		415-513-5985 belvederelegsled@gmail.com	302-442-7012 Imbarrie@theneschlaw.com	767-9192 kenns@beneschlaw.com	949-313-5029 csimon@bergerkahn.com	313-5029 csimon@bergerkahn.com
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402 West Broadway		10000 Ming Avenue 601 West Fifth Street, Suite	001	2001 Ross Avenue, Suite 3600	580 California Street	4	1999 Avenue of the stars	One Bryant Park		y.	1301 Avenue of the Americas	Effth Street	West Fifth Street	Section Contract	One AT&T Way, Room	an e	200		12518 Beverly Boulevard	TTTTO DEAGLE DOOLGAND	TIONT WISHING DIAM	1160 Battery Street	2001 Ross Avenue	e	211 Commerce Street	201 St. Charles Avenue,	2029 Century Park East	300	1 East Washington Street	Mail Code: NY1-100-21-01	3102 Oak Lawn Avenue #1100	350 South Grand Avenue, Sulte 2200	1777 Borel Place	and are property	777	1 Park Plaza, Suite 340	1 Sack Steam Sales 240
Attn: E. Elliot Adler, Geoffrey E. Marr, Brittany S. Zummer :4		Attn: Ron A. Symm		ARCHIYAN AMTCHELL and YELENA 2	Attn: Ashlev Vinson Crawford		Attn: David P. Simonds	Attn: Michael S. Stamer, Ira S. Dizengoff, David H. Botter	Sean T. Higglns,	ano John C. Inornton		Attn: Andy S. Kong and Christopher K.S.	kram Ordubegian	Steven	Attn: James W. Grudus, Esq.	ETTE		GARITA			Attn: Enc E. Sagerman, Lauren I. Attatu	Attn: Robert A. Julian, Cecily A. Dumas	Attn: C. Luckey McDowell, Ian E. Roberts, Kevin Chiu		P.	er, Jan M.	ian D. Huben	raig Solomon Ganz, Michael S.	Myers		ohn Fiske	Attn: Terry L Higham, Thomas E. McCurnin Christonhar D. Hisashi	Attn: Matthew D. Metiger	Attn: Kevin M. Capuzzi, Michael J.	Батпе	Attn: Krista M. Enns Attn: Craig S. Simon	
ADLER LAW GROUP, APLC		Aera Energy LLC	AKERMAN 11P	AKERMAN ILP	Alia Guma Secure Baras & Cald 110		Akin Gump Strauss Hauer & Feld LLP	Akin Gumo Straucs Hauer & Feld LLP		ANDREWS & THORNION	ARFINT FOX 11P	A A A A A A A A A A A A A A A A A A A	ASENT FOX 11 P		Arnoid & Porter Kaye Scholer LLP	Attorney General of California		Attorney General of California		BAILEY AND HOMEHO LAW FIRM	BAKER & HOSTETLER, LLP	BAKER & HOSTETLER, ULP	Baker Botts LL.P.	Baker Botts 1.1.P.	Baker, Donelson, Bearman, Caldwell & Berkowitz, PC	Baker, Donelson, Bearman, Caldwell &	Bellerd Snahr II P	and a planta care	BALLARD SPAHR LLP	Sank of America	Baron & Budd, P.C.	Action & Cottine II D	BELVEDERE LEGAL PC	SENESCH, FRIEDLANDER, COPLAN & ARONOFI	BENESCH, FRIEDLANDER, COPLAN & ARONOFF	LLP Berger Kahn, a Law Corporation	DELEGI AGILLY & core to post control
Counsel (A) for Mirna Trettevik, including other Fire Victim TAP Calmants	gy LLC, Midway Sunset	Congeneration Company Ae	Coursel of GRANSWESTERN PIPELINE COMPANY, ILC. AK			cured	Noteholders of Pacific Gas and Electric Company Ak	Counsel Seche Ad Hoc Committee of Senior Unsecured		Counselled gajanian, Inc.	Counseliro BOKF, NA, solely in its capacity as Indenture Trustee	oratories	Counselfur BOKF, IVA, solely in its capacity as		Counselfor AT&T	nin State Assessible			ain Fire Damage	Plaintiffs Claimants Propose a Committee of Torr		Caimar Control Control Control Control Control B	Counse Ar NRG Energy Inc., Clearway Energy, Inc.,	anway Energy, Inc.,		_	Т	Counse for Realty Income Corp., Counsel for	Discovery Mydrovae	Т	lldfires		Counsel for Dan Garke			Counsel Br Infosys Limited, Counsel for ACRT, Inc. III	

BINDER & MAITER, LLP	Attn: Michael W. Malter, Robert G. Harris, Heinz Binder	2775 Park Avenue		Santa Clara	5_	05056	408-295-1700	408-295-1531	Rob@bindermalter.com Heinz@bindermalter.com
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BRAYTON-PURCELL LLP	Attn: Alan R. Brayton, Esq. and Bryn G. Letsch, Esq.	222 Rush Landing Road	P.O. Box 6169	Novato	5	94948-6169	415-898-1555	415-898-1247	bletsch@braytonlaw.com
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	Attn: Valerie Bantner Peo, Shawn M.		17.00	1000	ć	04105-3493	415-227-0900	415-227-0770	schristianson@buchaiter.com
Buchalter, A Professional Corporation	Christianson Attn: Arocles Aguilar	505 Van Ness Avenue	17th Flodin	San Francisco	5 3	94102	415-703-2015	415-703-2262	
CHEVRON PRODUCTS COMPANY, A DIVISION OF CHEVRON IJ S.A. INC.		6001 Bollinger Canyon Road T2110	72110	San Ramon	ర	94583			melaniecruz@cnevron.com marmstrong@chevron.com
Clark & Trevithick	Attn: Kimberly S. Winick	800 Wilshire Boulevard	12th Floor	Los Angeles	ర	50017	213-629-5700	213-624-9441	kwinick@clarktrev.com
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d land	Avv. Baker Califano	201 California Street, 17th Floor		San Francisco	5	94111	415-433-1900	415-433-5530	pcalifano@cwclaw.com
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County of Sonoma	Attn: Tambra Curtis	Center Care Court Great		Woodland	5 5	95695	530-666-8278	530-666-8279	-
COUNTY OF TOLO	Attn: Mark D. Plevin, Brendan V.	Three Embarcadero Center,		\vdash					
Crawell & Moring LLP	Mullan	26th Floor 1001 Pennsylvania Avenue,		San Francisco	5	94111	415-986-2800	202-006-614	unique de constitución de cons
Crowell & Moring LLP	Attn: Monique D. Almy	N.W.		Washington	20 20	20004	415-585-5851	202-628-5116	typon@crowell.com
Crowell & Moring LLP	Attn: Tacie H. Yoon	1001 Pennsylvania Ave.,	26th Floor	San Francisco	8 8	94111	415-986-2800	202-624-2935	202-624-2935 tkoegel@crowell.com
Crowell & Moring LLP	Attn: Michael S. Danko, Kristine K. Maradith Shaun R Miller	333 Twin Dolohin Drive	Suite 145	Redwood Shores		94065	650-453-3600	650-394-8672	mdanko@dankolaw.com kmeredith@dankolaw.com smiller@dankolaw.com
DAMEN DE MEMBER III	Atto- Andrew D Yanhe	1600 El Comino Real		Menlo Park		94025	650-752-2000	650-752-2111	andrew.yaphe@davispolk.com
Desire Poly & Mandanial 119	Attn: Eli J. Vonnegut, David Schiff, Timothy Granilch	450 Lexington Avenue		New York	X	10017	212-450 4331	212-701-5331	
Debra Grassgreen	Attn: Karl Knight	1339 Pearl Street	Suite 201	Napa	ర	94558			dgrassgreen@gmail.com
Dentons IK IIP	Attn: Bryan E. Bates, Esq.	303 Peachtree St., NE, Suite 5300		Atlanta	e B	30308	404-527-4073	404-527-4198	bryan.bates@dentons.com
Dantons IIS II P	Attn: John A. Moe. II	601 S. Figueroa Street	Suite 2500	Los Angeles	క	90017-5704	213-623-9300	213-623-9924	John moe@dentons.com
		1221 Avenue of the		New York	Ž	10020-1089	212-768-5347		Lauren.macksoud@dentons.com
Demons us the	Atto: Lauren markspoor	One Market Plaza, Spear							

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	Halkirk I Wand Project LP	Dentons US LIP	Attn: Oscar N. Pinkas	Americas		New York	Ν	10020-1089	212-768-6701		
Comparison Com	elers Insurance	Dentons US ILP	Attn: Peter D. Wolfson	1221 Avenue of the		New York	NA.	10020	212-788-9800	00/9-90/-717	
District & New 1. America District between 100 March District between 100 March District between District bet	hwire Company LLC	Dentons US LLP	Attn: Samuel R. Maizel, Eso.	601 S. Figueroa Street	Suite 2500	Los Angeles	5	90017-5704	213-623-9300	213-623-9924	
	toc Group of Subrogation Claim	Diemer & Wei, LLP	Attn: Kathryn S. Diemer	100 West San Fernando	Surte 555	San Jose	5	95113	408-971-6270	408-971-6271	kdiemer@diemerwei.com
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Exemple Comparison Compar	Renewables North America LLC, Rising II LLC, and Arlington Wind Power		Arreltedie & Freiman Bandy Sawter	ROB Travis	Suite 700	Houston	¥	7007	713-265-0350	713-265-0365	Leslie.Freiman@edpr.com Randy.Sawyer@edpr.com
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	Regulatory Commission	Federal Energy Regulatory Commission	Attn: General Counsel	888 First St NE		Washington	20	20426			mon melandi @ diodocale loga
Freedom Name Free	ornia State Aerocias	FELDERSTEIN FITZGERALD WILLOUGHBY & PASCUZZI LLP	Attn: STEVEN H. FELDERSTEIN and PAUL J. PASCUZZI	400 Capitol Mail	Suite 1750	Sacramento	5	95814	916-329-7400	916-329-7435	-
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Taylor Foolish Duma 11 P	برا		Company	Frodelia & Lapping LLP	TROUTMAN SANDERS LLP		TROUTMAN SANDERS LLP	outman Sanders LLP	TURN—The Utility Reform Network	and the solid		II S Denartment of luctice		U.S. Departurent of source, Control of Source	U.S. Department of Justice, Civil Division	U.S. Nuclear Regulatory Commission	Union Pacific Railroad Company	United States Department of Justice Civil	United States Department of Justice Civil	Division	US Securities and Exchange Commission	IS Securities and Exchange Commission	WAGSTAFFE, VON LOEWENFELDT, BUSCH & RADWICK, LLP		Walkup Melodia Kelly & Schoenberger	Walter Wilhelm Law Group a Professional	100000000000000000000000000000000000000	Well, Golshal & Manges LLP		Weinberg Roger & Rosenfeld	White & Case LLP	White & Case LLP	White & Case LLP	Williams Kastner		Wilkie Farr & Gallagher L.P. Minke Farr & Dogo 118 Arro-Chris Johnstone
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